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AT BALTIMORE
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DISTRICT OF MARYLAND

## ATTACHMENT A STATEMENT OF FACTS

The undersigned parties stipulate and agree that, if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

The Black Guerilla Family, also known as "Jamaa" or "J," is a nationwide gang operating in prisons and on the streets of various cities throughout the United States. Founded in California in the 1960s, BGF first appeared in the Maryland correctional system in the 1990s. Although nominally still a prison gang, BGF has long been involved in criminal activity, including murder, murder for hire, robbery, drug trafficking, obstruction of justice and witness tampering throughout communities in Baltimore City.

The Defendant, Davante Harrison, associated with BGF throughout the period of the charged conspiracy in this case. The Defendant agreed to conduct and participate in BGF's affairs through a pattern of racketeering activity that included conspiracy to distribute controlled substances, possession with intent to distribute controlled substances, and murder.

As a part of his involvement in the conspiracy, the Defendant admits that between 2014 and 2016, he partnered with BGF members to supply heroin and cocaine to street-level drug "shops" in Baltimore City.

In addition, the Government would prove that on or about June 28, 2014, he paid a BGF member to murder Terrell Jarrett because the Defendant believed that Jarrett owed him money for a supply of narcotics that the Defendant had provided him on consignment. The Defendant paid the BGF member \$10,000 and supplied him with a gun, which the BGF member used to shoot Jarrett to death in the 1300 block of Ward Street in Baltimore City.

The Defendant also admits that in or about 2018, he associated with a BGF member to target his rivals J.A., R.Br., and R.Be.

The Defendant admits that on or about November 25, 2019, on Gelding Drive, in Cockeysville, Maryland, he possessed with intent to distribute heroin and unlawfully possessed a loaded Glock 23 .40 caliber handgun bearing serial number WKE393, all in furtherance of the conspiracy (United States v. Davante Harrison et al., CCB-19-575, and United States v. David Warren et al., JKB-22-439).

SO STIPULATED:

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Ari D. Evans
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Davante Harrison

Defendant

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